

**DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

COMMISSIONER OF THE DEPARTMENT OF
LICENSING AND CONSUMER AFFAIRS; and
GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS,

Plaintiffs,

v.

PEPSICO, INC.;
PEPSICO CARIBBEAN, INC.;
THE COCA-COLA COMPANY; and
CC ONE VIRGIN ISLANDS, LLC,

Defendants.

Case No. 1:25-cv-00024

**DEFENDANTS' UNOPPOSED RENEWED MOTION
TO EXTEND DEADLINE TO RESPOND TO THE COMPLAINT**

PepsiCo, Inc., PepsiCo Caribbean, Inc., The Coca-Cola Company, and CC One Virgin Islands, LLC (collectively, "Defendants") jointly and respectfully move unopposed to extend the deadline to respond to Plaintiffs' Complaint in this matter, D.I. 1-2, to 30 days after the disposition of Plaintiffs' motion to remand, D.I. 46. Pursuant to Local Rule 7.1(f), Defendants have conferred with counsel for the Plaintiffs who consents to the relief requested in this Motion and does not intend to file a response. In support thereof, Defendants submit the accompanying Memorandum and [Proposed] Order.

Dated: June 25, 2025

/s/ Chad C. Messier

Chad C. Messier
V.I. Bar No. 497
Dudley Newman Feuerzeig LLP
1000 Frederiksberg Gade
St. Thomas, VI 00802
Telephone: (340) 774-4422
Email: cmessier@dnfvi.com

Steven A. Zalesin
(admitted *pro hac vice*)
Patterson Belknap Webb & Tyler LLP
1133 Avenue of the Americas
New York, NY 10036
Telephone: (212) 336-2110
Email: szalesin@pbwt.com

Counsel for Defendant The Coca-Cola Company

/s/ Christopher Allen Kroblin

Christopher Allen Kroblin
V.I. Bar No. 966
Kellerhals Ferguson Kroblin PLLC
Royal Palms Professional Building
9053 Estate Thomas, Suite 101
St. Thomas, V.I. 00802-3602
Telephone: (340) 779-2564
Facsimile: (888) 316-9269
Email: ckroblin@kellfer.com

Counsel for Defendant CC One Virgin Islands, LLC

Respectfully submitted,

By: /s/ Andrew C. Simpson

Andrew C. Simpson
V.I. Bar No. 451
Andrew C. Simpson, P.C.
2191 Church St., Ste. 5
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (340) 719-3900
Email: asimpson@coralbrief.com

Andrew S. Tulumello (admitted *pro hac vice*)
Arianna M. Scavetti (admitted *pro hac vice*)
Claire L. Chapla (admitted *pro hac vice*)
Weil, Gotshal & Manges LLP
2001 M Street NW, Suite 600
Washington, DC 20036
Telephone: (202) 682-7000
Facsimile: (202) 857-0940
Email: drew.tulumello@weil.com
Email: arianna.scavetti@weil.com
Email: claire.chapla@weil.com

Counsel for Defendants PepsiCo, Inc. and PepsiCo Caribbean, Inc.